



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

EPA Region 5 Records Ctr.



362906

March 7, 2002

Roy Ball
Environ Corp.
740 Waukegan Road
Suite 401
Deerfield, IL 60015

Dear Roy:

Enclosed you will find Agency comments on the draft Preliminary Site Evaluation Report for the Eagle Zinc site. The comments will be separated into general comments which pertain to larger issues and specific comments on information presented.

General Comments

Throughout the report, references to various environmental standards are made. Because there has never been a direct request to IEPA for standards for the Eagle Zinc site, these references are premature. As part of the ARARs process, IEPA will be asked for appropriate environmental standards for all media as part of the RI/FS process-this will be a collective and consistent effort focused on all appropriate standards for the site.

As such, please remove all references to appropriate standards from this document. The conclusions presented regarding contaminants of concern should also be removed from the document. This particularly applies to Section VI of the report but also applies in other areas of the report.

Contaminant information can be referenced in this document and others to help properly design the RI/FS sampling strategy. The intent of this first deliverable was to summarize all site data collected to date so that a proper sampling strategy can be developed in the work plan.

Please remove the words “reportedly” from the text. If actual reports or documents are being cited, then this language is inappropriate. If the document being quoted from is not available, or Environ has not reviewed the contents, then it is inappropriate to quote conclusions.

Where are all of the documents that are referenced in this report? Are they available for Agency review or for inclusion into the site administrative record? Environ quotes from the conclusions of these reports but does not provide copies or reference where they can be obtained. Environ also states in the text that although the conclusions are being included in the report, Environ staff has not looked at the data to confirm or refute these conclusions. This analysis should have been part of the preparation of this report and the text modified as appropriate.

A site specific timeline should be prepared to summarize all of the prior site investigations and associated reports, to put previous site work into the proper context and time frames.

Specific Comments

1. Page 2 par 3. Where is School Street on Figure 2?
2. Page 5 par 1. Please include an explanation as to why the need for the engineered storm water retention system arose, who identified the need for its construction, why it was designed and built in it's current configuration and location, and what it's purpose is. Please include any references to State ARARs or other environmental regulations that were involved in the completion of this process.
3. Page 7 1st inc. par. What was present in the well logs below 13 feet? It is not clear from the text.
4. Page 7 par 3. Were the activities conducted by Philip Services Corporation also augmented by soils investigations in the area of the UST investigation? If so, what is and where are the results of this work?
5. Page 8 1st incomplete par. Were any door to door surveys conducted by Environ or any other entity historically? In Attachment A, there is reference to a well located within one mile of the site to the north. However, it is not referenced in the text as far as location, distance from the site, or included in any discussion regarding private well receptors. Drive by surveys are not typically conclusive when looking for private wells.
6. Page 8 par 1. References to MCLs should be removed from the text as outlined in general comments above.

7. Page 10 line 1-2 Aerial photos are not contained in Attachment C. Please provide.
8. Page 11 1973 par. What is the significance of the complete breaching of the dam? Please provide this detail here.
9. Page 11 B. par 1. Typo on line 3 change "the" to "be." What types of wastes were historically generated during the operational years? Information is presented on operational constituents but none is presented on waste streams. This would include sections B, C, and D.
10. Page 14. There is no information presented here on which piles are being studied for recycling and/or off-site disposal plans. There is no information regarding possible pile reconsolidation, or any information regarding any decision process for these piles as was required by the SOW. Please also provide an explanation for residual materials.
11. Page 15 par 3. What was the purpose of the May 1998 Interim Consent Order with IEPA? Why was it negotiated and what was the outcome? More detail is needed here. There is also no information regarding the RCRA and Solid Waste regulatory history with IEPA-please also provide an overview of this information in the text.
12. Page 16 last par. How often is monitoring required for the UST investigation? Who monitors the results and who gets the monitoring data? How does this data collection relate to the RI? Where was the UST located? What are the dates of monitoring and where are the wells located?
13. Page 17 par 1. Are the standards presented in these tables obtained from IEPA through a request for site ARARs? If not, then it is premature to complete much of the data interpretation that has been included in this report. IEPA has informed me that they typically use Tier 3 values for comparative purposes, not Tier 1.
14. Page 17 par 2. It is inappropriate to only reference conclusions from a report if actual soil data is not available for review.
15. Page 17 par 3. What was the purpose of the expanded site investigation performed by IEPA- was it to look for off-site contaminant migration?
16. Page 18 par 3. As mentioned above, until a consistent ARARs approach is reached for the site, it is inappropriate to eliminate contaminants from further review.
17. Page 19 Sediments. VOC and PCB sampling results were not included here.
18. Page 20 par 1. Have all piles been sampled and what constituents have been tested for? Please identify the piles that have not been sampled as the intent is to characterize all pile contents during the RI/FS.

19. Page 20 par 2. Were the analyte lists complete for this sampling? Why are only cadmium and lead singled out here? Are these constituents the main ones in these piles? Pile constituent information is also necessary here for future RI/FS sampling plans.

20. Page 20 par 3. How is the conclusion that off-site migration is not occurring from these piles supported by previous information. There are no pile constituent results presented here, nor is there pile location information or off-site sampling locations related to specific piles presented either. Additionally, the RI/FS calls for sampling in the western portion of the site area, which has not been sampled before and is located between the piles and the off-site areas to the west.

Have air samples been collected near the piles to confirm the Environ assertion that off-site migration is not occurring in the directions of prevailing winds? Off-site impacts will be more properly characterized during the RI/FS by presenting the information requested above.

21. Page 21 1st inc. par. Why was the change to monthly monitoring made at Outfall 002 in July 2000? Please include this information here.

22. Page 21. Groundwater. More detailed information on groundwater results are needed here.

23. Page 22 par 1. If the UST remains an on-site source of soil or groundwater contamination, then monitoring will be necessary. As such, it is premature to rule out the collection of any such information. Please include the UST investigation information as it pertains to previous sampling at the site which will be instrumental at designing a proper characterization program for the RI at the site.

24. Page 23. More detail on the January inspection is necessary here. Are there any inspection reports available from this visit?

25. Page 24 Tables. See general comment with respect to listing contaminants of concern in the various media at the site. It does not appear that all of the piles have been sampled or properly characterized to make contaminant conclusions as presented here.

If you have any questions, please contact me. As outlined in the Eagle Zinc Statement of Work, a final report, revised in accordance with these comments, is due by March 28, 2002.

Sincerely yours,



Dion Novak
Remedial Project Manager

cc: R. Lanham, IEPA
T. Krueger, EPA ORC
B. Sypniewski, EPA

1. OK
2. Storm with runoff was an issue related to intermorder?
Revise text to show need
3. 13' was the extent
4. Philip did one soil boring - revise text
5. No door to door surveys.
Well on glass property - refer to this
6. Gen cmts - remove
7. OK
8. Didn't need any more - breach as present now
- 9 & 10 - reference pile disposal ideas - separate out which ones they want to remove from RI/FS process.
11. - expand on consent order discussion
12. expand on discussions re: UST monitoring
13. Gen cmts. - remove
14. Report referred to existing data, didn't collect new data. Change references to information
15. refer to interim consent order text
16. Gen cmts
17. Discuss in-text - low detections
18. Add text introducing sampling grouping strategies

19. add. text to explain sampling strategies
20. point out areas where addit. data may be needed
21. Reference permit. ~~ad~~ always monthly - only sample when water is present.
22. Bring more info from tables into text
lead in par describing prev. investigations
23. Relate to cut 12 put UST on figure
~~refer to~~
24. Informal visit to look ~~at~~ west & northern areas
looked at each wells.
* All info is included here
include any available well construction details

General comments

1. Remove all references to stds.
Remove all conclusions - they will reference
in workplan discussions.

Timeline included

Conceptual model

remove actual contam. constituents info from Model.
refer to inorganics only

due 3/28